



U.S. Department of Justice

United States Attorney
Southern District of New York

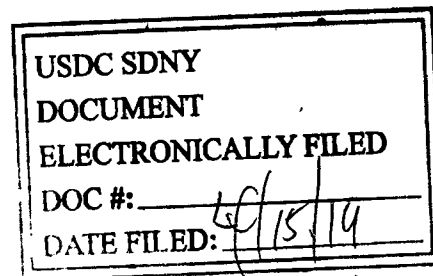
The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

April 11, 2019

Via ECF

The Honorable Jed S. Rakoff
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Cesar Altieri Sayoc*,
18 Cr. 820 (JSR)



Dear Judge Rakoff:

The Government respectfully submits this letter in response to the Court's April 5, 2019 order. Based on the content of the defendant's two post-plea submissions to the Court, the Government respectfully submits that his guilty plea should be vacated. The defendant's claims regarding current counsel also give rise to potential conflicts of interest that should be evaluated pursuant to the procedures set forth in *Curcio*, including giving the defendant an opportunity to consult with new counsel regarding whether he wishes to waive the potential conflicts and proceed with current counsel. In the absence of a knowing and voluntary waiver of all potential conflicts, new counsel should be appointed to represent the defendant. The Government will submit proposed questions related to the requested *Curcio* proceeding if helpful to the Court.

Respectfully submitted,

GEOFFREY S. BERMAN
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Southern District of New York

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Cc: Defense Counsel
(Via ECF)